

EXHIBIT 1

Christopher T. Micheletti

From: Christopher T. Micheletti
Sent: Thursday, March 15, 2018 12:36 PM
To: john.taladay@bakerbotts.com; erik.koons@bakerbotts.com
Cc: MAloto@TATP.com
Subject: RE: Irico
Attachments: CRT_IPP_First_Set_Interrogatories_to_IRICO.pdf; CRT_IPP_First_Set_RFPs_to_IRICO.pdf

John,

Further to our discussions over the past few weeks, attached hereto please find written discovery (RFPs, Interrogatories) we intend to serve on the Irico defendants. We would like to have a discussion with you and/or Erik before doing so. Are you and/or Erik available for a call Monday (3/19) afternoon to discuss? If so, let us know a good time. If Monday does not work, let us know some other days/times next week.

Thanks.

Chris

Christopher Micheletti
Attorney at Law
cmicheletti@zelle.com

ZELLE LLP

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From: john.taladay@bakerbotts.com [mailto:john.taladay@bakerbotts.com]
Sent: Wednesday, February 21, 2018 10:38 PM
To: MAloto@TATP.com
Cc: Christopher T. Micheletti <CMicheletti@zelle.com>; erik.koons@bakerbotts.com
Subject: RE: Irico

--EXTERNAL EMAIL--

That should work. Please call my office. 202-639-7909

Thanks

From: Mario Alioto [<mailto:MAlioto@TATP.com>]
Sent: Wednesday, February 21, 2018 6:10 PM
To: Taladay, John
Cc: CMICHELETTI@zelle.com; Koons, Erik
Subject: RE: Irico

How about Friday at 4 pm EST/1 pm PST.

Mario N. Alioto
TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
2280 Union Street
San Francisco, CA 94123
Telephone:415 447-1650
Facsimile:415 346-0679

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From: john.taladay@bakerbotts.com [<mailto:john.taladay@bakerbotts.com>]
Sent: Tuesday, February 20, 2018 8:58 PM
To: MAlioto@TATP.com
Cc: CMICHELETTI@zelle.com; erik.koons@bakerbotts.com
Subject: RE: Irico

Mario,
I'm traveling for work through Thursday night. Back Friday and could talk Friday afternoon.
Thanks.
John

From: Mario Alioto [<mailto:MAlioto@TATP.com>]
Sent: Tuesday, February 20, 2018 8:43 PM
To: Taladay, John
Cc: Chris Micheletti
Subject: Irico

John, is there some time tomorrow or Thursday when you could be available for a short conference call with us. Let me know and we will call you. Thanks.

Mario N. Alioto
TRUMP, ALIOTO, TRUMP & PRESCOTT, LLP
2280 Union Street
San Francisco, CA 94123
Telephone:415 447-1650
Facsimile:415 346-0679

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EXHIBIT 2

Christopher T. Micheletti

From: stuart.plunkett@bakerbotts.com
Sent: Thursday, May 24, 2018 10:53 AM
To: LaurenRussell@TATP.com
Cc: Christopher T. Micheletti; john.taladay@bakerbotts.com; erik.koons@bakerbotts.com; Tom.Carter@BakerBotts.com; malioto@tatp.com; Qianwei Fu
Subject: RE: CRTs - Irico

--EXTERNAL EMAIL--

Lauren,

This issue would need to be raised by motion.

Regards,

Stuart

Stuart C. Plunkett

Partner, San Francisco Office
stuart.plunkett@bakerbotts.com
T +1.415.291.6203
C +1.415.608.8165

From: Lauren Capurro (Russell) <LaurenRussell@TATP.com>
Sent: Wednesday, May 23, 2018 5:15 PM
To: Plunkett, Stuart <stuart.plunkett@bakerbotts.com>
Cc: CMicheletti@zelle.com; Taladay, John <john.taladay@bakerbotts.com>; Koons, Erik <erik.koons@bakerbotts.com>; Carter, Tom <Tom.Carter@BakerBotts.com>; malioto@tatp.com; QFu@zelle.com
Subject: RE: CRTs - Irico

Stuart,

Thank you for your response. It seems we'll need to have Judge Tigar decide this issue. We propose that we submit a joint letter brief this Friday with alternative proposed orders on scheduling and Tigar can pick one. We can exchange drafts of our sections around noon on Friday & file the letter/proposed orders at around 5pm Friday. Please let me know if this will work for you. Thanks.

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
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Fax: (415) 346-0679

E-mail: lauren russell@t ATP.com

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From: stuart.plunkett@bakerbotts.com [<mailto:stuart.plunkett@bakerbotts.com>]

Sent: Wednesday, May 23, 2018 4:42 PM

To: LaurenRussell@TATP.com

Cc: CMicheletti@zelle.com; john.taladay@bakerbotts.com; erik.koons@bakerbotts.com; Tom.Carter@BakerBotts.com; malioto@t ATP.com; QFu@zelle.com

Subject: RE: CRTs - Irco

Lauren,

Your response indicates that IPPs may file their own opposition to Irco's jurisdictional motion and that IPPs may also pursue discovery beyond what DPPs seek. Under these circumstances, we cannot agree that the schedule set by the Court for the DPPs should also apply to the IPPs. We would certainly need more time for discovery and briefing if the IPPs participate and add additional discovery and briefing that Irco must respond to. Also, until the Court sets a schedule for the IPPs, we do not agree that we need to file our jurisdictional motion in the IPP case. We currently do not intend to do so unless the Court issues an order setting a schedule for the IPPs.

Regards,

Stuart

Stuart C. Plunkett

Partner, San Francisco Office

stuart.plunkett@bakerbotts.com

T +1.415.291.6203

C +1.415.608.8165

From: Lauren Capurro (Russell) <LaurenRussell@TATP.com>

Sent: Monday, May 21, 2018 4:27 PM

To: Plunkett, Stuart <stuart.plunkett@bakerbotts.com>

Cc: CMicheletti@zelle.com; Taladay, John <john.taladay@bakerbotts.com>; Koons, Erik <erik.koons@bakerbotts.com>; Carter, Tom <Tom.Carter@BakerBotts.com>; malioto@t ATP.com; QFu@zelle.com

Subject: RE: CRTs - Irco

Stuart:

IPPs will agree that Irco need not respond to the currently-pending IPP discovery requests, except for RFP Nos. 11 and 18, and Interrogatory Nos. 16, 17, and 18. IPPs will coordinate with the DPPs on all future discovery as required by the discovery coordination order, including propounding joint written discovery requests. IPPs believe, however, that IPP-specific issues may arise and may require IPPs to propound IPP-specific requests within those joint discovery requests. Therefore, IPPs must reserve the right to propound those IPP-specific requests. In addition, IPPs will not agree to be limited to the number of interrogatories that DPPs are entitled to under FRCP 33.

With regard to briefing your motion (which we assume you would be filing in both the DPP and IPP cases?), IPPs have conferred with the DPPs and they are unwilling to commit to a single, joint opposition brief without seeing your motion. In any event, any joint opposition could only pertain to overlapping issues. To the extent there are IPP-specific issues

raised by your motion, IPPs must reserve the right to brief those separately. At this stage, and given the DPPs' position, all we can do is agree to work with the DPPs to file a single, joint opposition to Irico's jurisdictional motion regarding overlapping issues and, if page limits are not an issue, we will brief any IPP-specific issues within the single, joint opposition.

Please let us know if this is acceptable to Irico. Thank you.

Lauren

Lauren C. Capurro (Russell)
Attorney at Law
Trump, Alioto, Trump & Prescott, LLP
2280 Union Street
San Francisco, CA 94123
Tel: (415) 563-7200
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Fax: (415) 346-0679
E-mail: laurenrussell@tntp.com

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From: stuart.plunkett@bakerbotts.com [<mailto:stuart.plunkett@bakerbotts.com>]
Sent: Sunday, May 13, 2018 11:10 PM
To: LaurenRussell@TATP.com
Cc: CMicheletti@zelle.com; john.taladay@bakerbotts.com; erik.koons@bakerbotts.com; Tom.Carter@BakerBotts.com; malioato@tntp.com; QFu@zelle.com
Subject: RE: CRTs - Irico

Lauren,

We would agree to stipulate to the current schedule if you confirm that coordinating with the DPPs means that IPPs and DPPs will file a single, joint opposition to Irico's jurisdictional motion and IPPs will not seek discovery in addition to what DPPs seek. If you want to discuss this, please let me know. We are available Monday for a call.

Regards,

Stuart

Stuart C. Plunkett
Partner, San Francisco Office
stuart.plunkett@bakerbotts.com
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C +1.415.608.8165

From: Lauren Capurro <LaurenRussell@TATP.com>
Sent: Saturday, May 12, 2018 10:54 AM
To: Plunkett, Stuart <stuart.plunkett@bakerbotts.com>
Cc: CMicheletti@zelle.com; Taladay, John <john.taladay@bakerbotts.com>; Koons, Erik <erik.koons@bakerbotts.com>;

Carter, Tom <Tom.Carter@BakerBotts.com>; malioto@tatp.com; QFu@zelle.com

Subject: Re: CRTs - Irico

Stuart,

Thank you for your letter. Since we appear to be at an impasse, we propose that we submit a joint letter brief on Tuesday with alternative proposed orders on scheduling and Tigar can pick one. We can exchange drafts of our sections around noon on Tuesday & file the letter/proposed orders at around 5pm Tuesday.

Please let us know your thoughts. Thank you.

Lauren

Sent from my iPhone

On May 10, 2018, at 4:58 PM, <stuart.plunkett@bakerbotts.com> <stuart.plunkett@bakerbotts.com> wrote:

Please see attached correspondence.

Stuart C. Plunkett

Partner, San Francisco Office

stuart.plunkett@bakerbotts.com

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C +1.415.608.8165

From: Lauren Capurro (Russell) <LaurenRussell@TATP.com>

Sent: Wednesday, May 9, 2018 1:24 PM

To: Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; CMicheletti@zelle.com; Taladay, John <john.taladay@bakerbotts.com>; Koons, Erik <erik.koons@bakerbotts.com>; Carter, Tom <Tom.Carter@BakerBotts.com>

Cc: malioto@tatp.com

Subject: RE: CRTs - Irico

Stuart:

Please see the attached letter.

Best,

Lauren

Lauren C. Capurro (Russell)

Attorney at Law

Trump, Alioto, Trump & Prescott, LLP

2280 Union Street

San Francisco, CA 94123

Tel: (415) 563-7200

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E-mail: lauren russell@tatp.com

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From: stuart.plunkett@bakerbotts.com [<mailto:stuart.plunkett@bakerbotts.com>]
Sent: Thursday, May 03, 2018 10:36 AM
To: CMicheletti@zelle.com; john.taladay@bakerbotts.com; erik.koons@bakerbotts.com; Tom.Carter@BakerBotts.com
Cc: lauren russell@tatp.com; malioto@tatp.com
Subject: RE: CRTs - Irico

Friday at 2 p.m. works for us. I will circulate an invite. Thanks.

Stuart C. Plunkett

Partner, San Francisco Office
stuart.plunkett@bakerbotts.com
T +1.415.291.6203
C +1.415.608.8165

From: Christopher T. Micheletti <CMicheletti@zelle.com>
Sent: Wednesday, May 2, 2018 5:12 PM
To: Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; Taladay, John <john.taladay@bakerbotts.com>; Koons, Erik <erik.koons@bakerbotts.com>; Carter, Tom <Tom.Carter@BakerBotts.com>
Cc: lauren russell@tatp.com; malioto@tatp.com
Subject: RE: CRTs - Irico

Yes, we would like to meet and confer.

We would like to discuss your position on the stipulation we proposed, the grounds therefor, Irico's proposal (if any) with regard the schedule for its jurisdictional motion in the IPP case, and discovery in the IPP and DPP cases.

We are available tomorrow from 9 am or so until 330 pm pacific, and Friday from 10-11 pacific or at 2 pm pacific, with a preference for the morning on Friday. Please let us know what times work for you. Thanks.

From: stuart.plunkett@bakerbotts.com [<mailto:stuart.plunkett@bakerbotts.com>]
Sent: Wednesday, May 2, 2018 3:34 PM
To: Christopher T. Micheletti <CMicheletti@zelle.com>; john.taladay@bakerbotts.com; erik.koons@bakerbotts.com; Tom.Carter@BakerBotts.com
Cc: lauren russell@tatp.com; malioto@tatp.com
Subject: RE: CRTs - Irico

--EXTERNAL EMAIL--

Chris – I'm not available at 4:00 today, but more importantly, if you're proposing a meet and confer, I suspect folks on our team in DC might want to participate. Can you let us know what you have in mind and then we can schedule a call that works for everyone? Thanks. Stuart

Stuart C. Plunkett

Partner, San Francisco Office
stuart.plunkett@bakerbotts.com
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C +1.415.608.8165

From: Christopher T. Micheletti <CMicheletti@zelle.com>
Sent: Wednesday, May 2, 2018 3:27 PM
To: Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; Taladay, John <john.taladay@bakerbotts.com>; Koons, Erik <erik.koons@bakerbotts.com>
Cc: lauren russell@tatp.com; malioto@tatp.com
Subject: RE: CRTs - Irco

Stuart, are you available to talk at 4 pm? Chris

From: stuart.plunkett@bakerbotts.com [<mailto:stuart.plunkett@bakerbotts.com>]
Sent: Wednesday, May 2, 2018 2:18 PM
To: Christopher T. Micheletti <CMicheletti@zelle.com>; john.taladay@bakerbotts.com; erik.koons@bakerbotts.com
Cc: lauren russell@tatp.com; malioto@tatp.com
Subject: RE: CRTs - Irco

--EXTERNAL EMAIL--

Chris,

We do not agree to the stipulation. IPPs chose not to contribute to the Joint CMC Statement or to appear at the CMC. As a result, Irco negotiated the schedule the Court entered only with the DPPs. Furthermore, it appears that IPPs do not intend to coordinate with the DPPs, but will instead pursue their own discovery and file their own opposition to Irco's motion. For those reasons, we cannot agree to the schedule set forth in the stipulation.

Regards,

Stuart

Stuart C. Plunkett
Partner, San Francisco Office
stuart.plunkett@bakerbotts.com
T +1.415.291.6203
C +1.415.608.8165

From: Christopher T. Micheletti <CMicheletti@zelle.com>
Sent: Wednesday, May 2, 2018 12:38 PM
To: Plunkett, Stuart <stuart.plunkett@bakerbotts.com>; Taladay, John <john.taladay@bakerbotts.com>; Koons, Erik <erik.koons@bakerbotts.com>
Cc: lauren russell@tatp.com; malioto@tatp.com
Subject: RE: CRTs - Irco

Stuart,

Following-up on our email and proposed stipulation below, please let us know the status.

We would like to get the stipulation on file this week. Thanks.

Chris

From: Christopher T. Micheletti
Sent: Monday, April 30, 2018 2:04 PM
To: stuart.plunkett@bakerbotts.com; john.taladay@bakerbotts.com; 'erik.koons@bakerbotts.com'
<erik.koons@bakerbotts.com>
Cc: lauren russell@tatp.com; malioto@tatp.com
Subject: Re: CRTs - Irico

Stuart, further to our call today, please find attached a proposed stipulation regarding jurisdictional discovery and related motion practice for the IP case. Please let us know if this is acceptable. Thanks. Chris

From: Christopher T. Micheletti
Sent: Friday, April 27, 2018 4:47 PM
To: stuart.plunkett@bakerbotts.com; john.taladay@bakerbotts.com; 'erik.koons@bakerbotts.com'
Cc: lauren russell@tatp.com; malioto@tatp.com
Subject: RE: CRTs - Irico

Stuart,

I have not heard from you, so I assume today was not a good day for you or John or Eric to talk.

We understand that you are conferring with the DPPs regarding submission of a stipulation regarding briefing and discovery related to Irico's anticipated motion to dismiss based on jurisdictional grounds. We are assuming that Irico intends to contest jurisdiction in the IPP case as well. If that is not correct, please advise.

IPPs would like to be included in any stipulation entered with the DPPs that will be filed on May 1, 2018 per Judge Tigar's order. We see no reason for IPPs to be on a separate or later track, and believe it would be inefficient to go that route. Given the Tuesday deadline for submission of a stipulation (or separate proposed orders), we would like to discuss this with you on Monday.

Please let us know your availability.

Chris

Christopher Micheletti
Attorney at Law
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From: Christopher T. Micheletti
Sent: Thursday, April 26, 2018 5:17 PM
To: 'stuart.plunkett@bakerbotts.com' <stuart.plunkett@bakerbotts.com>
Cc: lauren russell@tstp.com; malioto@tstp.com; john.taladay@bakerbotts.com; 'erik.koons@bakerbotts.com' <erik.koons@bakerbotts.com>
Subject: CRTs - Irico

Stuart, are you available tomorrow for call to discuss scheduling and coordination in the above matter with Lauren and I?

If so, do any of these times work? 9 am, 11 am, 12 pm?

Let us know. Chris

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<Ltr.pdf>

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2 Erik Koons (*pro hac vice*)
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3 1299 Pennsylvania Ave., NW
Washington, D.C. 20004
4 Telephone: 202.639.7700
Facsimile: 202.639.7890

5 Stuart C. Plunkett (State Bar No. 187971)
stuart.plunkett@bakerbotts.com
6 BAKER BOTTS LLP
7 101 California Street, Suite 3070
San Francisco, California 94111
8 Telephone: (415) 291-6200
Facsimile: (415) 291-6300

9 *Attorneys for Defendants*
10 *IRICO GROUP CORP. and*
IRICO DISPLAY DEVICES CO., LTD.

11 [Additional Counsel Appear on Signature Page]

12 **UNITED STATES DISTRICT COURT**
13 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**
15

16 IN RE: CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION,

) Case No. 3:07-cv-05944-JST

) MDL No.: 1917

18 THIS DOCUMENT RELATES TO:

) **STIPULATION AND [PROPOSED]**
) **ORDER RE JURISDICTIONAL**
) **DISCOVERY, BRIEFING**
) **SCHEDULE, AND HEARING DATES**

19 *ALL INDIRECT PURCHASER ACTIONS*
20
21
22

1 Indirect Purchaser Plaintiffs (“IPPs”) and Defendants Irico Display Devices Co., Ltd.
 2 and Irico Group Corporation (together, “Irico”), by and through undersigned counsel, hereby
 3 stipulate as follows:

4 WHEREAS, the clerk entered default as to Irico in both the Direct Purchaser (“DP”) and
 5 Indirect Purchaser (“IP”) Actions (ECF No. 4727, July 20, 2016; ECF No. 4729, July 22, 2016);

6 WHEREAS, on February 1, 2018, the Court granted Irico’s motion to set aside default
 7 and denied the motion for entry of default judgment as moot in the DP Action (ECF No. 5240),
 8 and the Court ruled that “[t]he case against the Irico Defendants having now reopened, the
 9 [Direct Purchaser Plaintiffs] are free to undertake jurisdictional discovery” (*id.* at 20);

10 WHEREAS, IPPs served written jurisdictional discovery on Irico on March 27, 2018, and
 11 the parties have agreed that responses and objections shall be due on or before May 25, 2018;

12 WHEREAS, on April 6, 2018, upon stipulation of the parties, the Court vacated the entry
 13 of default as to Irico, and ordered that IPPs are free to undertake jurisdictional discovery (ECF
 14 No. 5271);

15 WHEREAS, on April 25, 2018, the Court denied the Direct Purchaser Plaintiffs (“DPPs”)
 16 motion to compel Irico to respond to five discovery requests filed in 2010 and 2011 and directed
 17 the parties “to submit a jointly proposed schedule . . . for the completion of jurisdictional
 18 discovery and briefing” on a motion by Irico to resolve jurisdictional issues (ECF No. 5277);

19 WHEREAS, the IPPs and Irico have met and conferred regarding a proposed schedule for
 20 jurisdictional discovery, briefing, and hearing for such a motion by Irico in the IP Action;

21 IT IS HEREBY STIPULATED AND AGREED by and between counsel for Irico and
 22 IPPs, that:

- 23 1. Irico’s jurisdictional motion in the IP Action will proceed on the same schedule as its
 24 jurisdictional motion in the DP Action;
- 25 2. Irico’s opening motion regarding jurisdictional issues shall be due on or before July
 26 18, 2018;
- 27 3. Jurisdictional discovery shall close on October 3, 2018;
- 28 4. IPPs’ opposition to the motion shall be due on or before October 15, 2018;

5. Irico's reply in support of its motion shall be due on or before November 15, 2018;
and

6. The hearing on the motion shall be set for December 6, 2018 at 2 pm, or at some other
date and time convenient for the Court.

Dated: May 29, 2018

/s/ Mario N. Alioto

Mario N. Alioto (56433)

Lauren C. Capurro (241151)

TRUMP, ALIOTO, TRUMP &
PRESCOTT, LLP

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malioto&tatp.com

lauren russell@tatp.com

*Lead Counsel for the Indirect Purchaser
Plaintiffs*

/s/ Stuart C. Plunkett

John Taladay (*pro hac vice*)

john.taladay@bakerbotts.com

Erik Koons (*pro hac vice*)

erik.koons@bakerbotts.com

1299 Pennsylvania Ave., NW

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Telephone: 202.639.7700

Facsimile: 202.639.7890

Stuart C. Plunkett (State Bar No. 187971)

stuart.plunkett@bakerbotts.com

BAKER BOTTS LLP

101 California Street, Suite 3070

San Francisco, California 94111

Telephone: (415) 291-6200

Facsimile: (415) 291-6300

*Attorneys for Defendants Irico Group Corp. and
Irico Display Devices Co., Ltd.*

IT IS SO ORDERED.

DATED: _____

BY: _____

Hon. Jon S. Tigar

United States District Judge

Trump Alioto Trump & Prescott

ATTORNEYS LLP
2280 Union Street
San Francisco, California 94123
(415) 563-7200
FAX (415) 346-0679

May 9, 2018

VIA ELECTRONIC MAIL

Stuart Plunkett
BAKER BOTTS LLP
101 California Street Suite 3600
San Francisco, California 94111

Re: *In Re: Cathode Ray Tubes (CRT) Antitrust Litigation*, MDL 1917

Dear Stuart:

We write to follow up on our May 3, 2018 call regarding the schedule for filing Irico's FSIA motion and discovery related thereto in the IPP case.

Prior to the call, we sent you a draft stipulation proposing that the parties agree to the same schedule as the DPP case. You rejected that proposal on the ground that you did not contemplate the IPPs would be participating in discovery or responding to the FSIA motion, and would not have agreed to the schedule entered in the DPP case if you had known the IPPs would be involved. You proposed that IPPs essentially stay their case against Irico and agree to be bound by the result of Irico's FSIA motion against the DPPs.

We explained that it would be a breach of our fiduciary duty to the IPP class to allow counsel for another class to represent their interests. We pointed out that you were in fact aware that IPPs would be participating in discovery since we recently stipulated to set aside the default against Irico, and served discovery requests on Irico over a month before you agreed to the schedule with the DPPs, and responses to those requests are due on or before May 25, 2018. Moreover, we contacted you right after the CMC and several days before you entered into the stipulation with the DPPs, and told you that IPPs wanted to be included in the stipulation or at least be on the same schedule. Thus, it was unreasonable for you to believe IPPs would not be involved in discovery relating to the FSIA motion.

We also noted that discovery in the IPP and DPP cases will likely overlap substantially, although it is difficult for us to know at this stage how much since we haven't seen Irico's FSIA motion. Nevertheless, we stated that we would coordinate with the DPPs on discovery (as we have done throughout this case in the discovery relating to all other defendants), and the FSIA motion to avoid duplication. You stated that you would need additional assurances regarding IPPs' coordination with the DPPs before you could agree to the same schedule. We agreed to speak to the DPPs and get back to you.

Stuart Plunkett
May 9, 2018
Page 2 of 2

We have now spoken to counsel for the DPPs and can confirm that we are coordinating on discovery, and will continue to do so, as required by the Order Re Discovery and Case Management Protocol, ECF No. 1128. We will also coordinate on briefing the FSIA motion. In light of this, we believe that the schedule agreed to by Irico and the DPPs provides more than enough time for all parties to address any discovery issues that arise and brief the FSIA motion. If this changes, we can address it then.

Please let us know if you will agree to the stipulation that we have proposed by COB tomorrow. Thank you.

/s/ Lauren C. Capurro
Lauren C. Capurro
Lead Counsel for the Indirect Purchaser Plaintiffs

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May 10, 2018

VIA E-MAIL (lauren russell@tatp.com)

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Trump Alioto Trump & Prescott
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Re: In re: Cathode Ray Tubes (CRT) Antitrust Litigation -
Master File No. 3:07-cv05944-SC; MDL No. 1917

Ms. Capurro:

This responds to your letter of May 9, 2018. As I understand your letter, you are asking Irico to sign the same stipulation that we discussed on our May 3, 2018 call. That stipulation would join IPPs in the same schedule that Irico worked out with the DPPs for jurisdictional discovery and briefing. Your letter, however, does not answer any of the questions we discussed on our call.

I note preliminarily that you gloss over IPP's decision to skip the April 24 Case Management Conference, and you assume without any basis that the schedule negotiated with DPPs necessarily contemplated IPP's participation. As we told you on the phone conference, Irico and the DPPs did not contemplate IPP's participation in jurisdictional discovery and briefing in making their arguments to the Court at the CMC or in the stipulated schedule that the Court entered as an Order. While it is true that IPPs had served discovery, IPPs subsequently chose not to participate in the CMC. That decision contradicted representations IPPs had made to me and thus led us to believe that IPPs had decided not to participate in jurisdictional matters. During a conference call on March 26—a month before the CMC—Mr. Alioto told me that IPPs planned to participate in the CMC. The next day, IPPs served two sets of discovery. Again, in a call on March 16, after I forwarded to IPPs the draft CMC statements of Irico and DPPs, Mr. Alioto told me that IPP's were "too pressed for time" to contribute to the joint statement but would still participate in the CMC. Mr. Alioto said he would call me prior to the CMC to let me know IPP's position regarding jurisdictional discovery and scheduling so Irico would not be "blind-sided" at the CMC. Mr. Alioto never called me, and IPPs did not appear at the CMC (even though Mr. Alioto was in the courtroom). Given these circumstances, Mr. Micheletti's request after the CMC to sign onto the stipulation was not grounds for reconsidering the

BAKER BOTTS LLP

Lauren C. Capurro

- 2 -

May 10, 2018

schedule. DPPs and Irico had been ordered by the Court to submit a schedule based on what was discussed at the CMC.

IPPs subsequently sent a stipulated schedule to us that had the same deadlines as those negotiated with the DPPs. During our May 3 call, we told you that if IPPs planned to participate in a manner that would add any burden on Irico, the schedule would need to be renegotiated. We asked you several questions that you still have not answered, including whether IPPs intend to pursue discovery prior to the motion being filed in addition to what DPPs pursue; whether IPPs may file motions to compel in addition to whatever DPPs file; whether IPPs will attempt to take depositions in addition to depositions noticed by the DPPs; whether IPPs will file their own opposition brief; and if so, whether IPPs will seek discovery in advance of filing an opposition in addition to what DPPs seek. You would not confirm any of the answers, instead reserving your rights to do all of these things. In light of IPP's inability to confirm that they would not *significantly* add to the burden of jurisdictional discovery and briefing on Irico—including requiring Irico to respond to two separate opposition briefs even though the schedule contemplated Irico responding to just DPP's briefing—we asked you to meet and confer with DPPs *to come up with a revised schedule that accommodates IPP's intentions with regard to jurisdictional discovery and briefing*. Your letter misstates what we asked you to do (we did not ask for further assurances on coordination) and does not answer the questions we need answered to work with IPPs and DPPs on an appropriate revised schedule.

Let us know if you would like to discuss this further.

Sincerely,



Stuart C. Plunkett

EXHIBIT 3

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10 *Attorneys for Defendants*
11 *IRICO GROUP CORP. and*
12 *IRICO DISPLAY DEVICES CO., LTD.*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16
17 IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

Master File No. 3:07-cv-05944-JT
(N.D. Cal.)

MDL No. 1917

18
19 This Document Relates to:

20 ALL INDIRECT PURCHASER ACTIONS

**IRICO DEFENDANTS' OBJECTIONS
AND RESPONSES TO INDIRECT
PURCHASER PLAINTIFFS' FIRST SET
OF REQUESTS FOR PRODUCTION OF
DOCUMENTS**

21
22
23 PROPOUNDING PARTY:

Indirect Purchaser Plaintiffs

24 RESPONDING PARTIES:

Irigo Group Corporation
Irigo Display Devices Co., Ltd.

25 SET NO.:

One

Pursuant to Federal Rules of Civil Procedure 26 and 34, Irico Group Corporation and Irico Display Devices Co, Ltd. (collectively, “Irico” or “Irico Defendants”) hereby responds to the Indirect Purchaser Plaintiffs’ (“Plaintiff”) First Set of Requests for Production of Documents (“Requests”). Irico reserves the right to amend or supplement these Objections and Responses (the “Responses”) to the extent allowed by the Federal Rules of Civil Procedure and the Local Rules of Practice in Civil Proceedings before the United States District Court for the Northern District of California (“Local Rules”). Subject to and without waiving any of Irico’s General and Specific Objections as set forth below, Irico is willing to meet and confer with Plaintiff regarding such General and Specific Objections.

The following Responses are made only for purposes of this case. The Responses are subject to all objections as to relevance, materiality and admissibility, and to any and all objections on any ground that would require exclusion of any response if it were introduced in court. All evidentiary objections and grounds are expressly reserved.

These Responses are subject to the provisions of the Stipulated Protective Order that the Court issued on June 18, 2008 (“Protective Order”). Irico’s Responses are hereby designated “Confidential” in accordance with the provisions of the Protective Order.

GENERAL OBJECTIONS

Irico makes the following General Objections to Plaintiff’s Requests:

1. Irico’s Responses are based upon information available to and located by Irico as of the date of service of these Responses. In responding to Plaintiff’s Requests, Irico states that it has conducted, or will conduct, a diligent search, reasonable in scope, of those files and records in its possession, custody, or control believed to likely contain information responsive to Plaintiff’s Requests.

2. No express, incidental, or implied admissions are intended by these Responses and should not be read or construed as such.

3. Irico does not intend, and its Responses should not be construed as, an agreement or acquiescence with any characterization of fact, assumption, or conclusion of law contained in or implied by the Requests.

1 4. To the extent that Irico responds to Plaintiff's Requests by stating that Irico will
2 produce or make available for examination responsive information or documents, Irico does not
3 represent that any such information or documents exist. Irico will make a good faith and
4 reasonable attempt to ascertain whether information responsive to Plaintiff's Requests exists and
5 is properly producible, and will produce or make available for examination non-privileged
6 responsive materials to the extent any are located during the course of a reasonable search.

7 5. Irico objects to Plaintiff's Requests to the extent that they are overly broad, unduly
8 burdensome, oppressive, and duplicative to the extent that they seek information or documents
9 that are already in the possession, custody, or control of Plaintiff.

10 6. Irico objects to Plaintiff's Requests to the extent that they seek to impose
11 obligations on Irico beyond those of the Federal Rules of Civil Procedure, the Local Rules, or any
12 Order of this Court.

13 7. Irico objects to Plaintiff's Requests to the extent they seek information or
14 documents that are not relevant to jurisdictional issues or disproportionate to the needs of the case
15 in resolving such jurisdictional issues.

16 8. Irico objects to Plaintiff's Requests to the extent that they are vague, ambiguous,
17 or susceptible to more than one interpretation. Irico shall attempt to construe such vague or
18 ambiguous Requests so as to provide for the production of responsive information or documents
19 that are proportionate to the needs of the case. If Plaintiff subsequently asserts an interpretation of
20 any Request that differs from Irico's understanding, Irico reserves the right to supplement or
21 amend its Responses.

22 9. Irico objects to Plaintiff's Requests to the extent that they contain terms that are
23 insufficiently or imprecisely defined. Irico shall attempt to construe such vague or ambiguous
24 Requests so as to provide for the production of responsive information or documents that are
25 proportionate to the needs of the case.

26 10. Irico objects to Plaintiff's Requests to the extent that they seek information or
27 documents that are protected from disclosure by the attorney-client privilege, work product
28 doctrine, joint defense or common interest privilege, self-evaluative privilege, or any other

1 applicable privilege or immunity. Irico will provide only information that it believes to be non-
2 privileged and otherwise properly discoverable. None of Irico's responses is intended nor should
3 be construed as a waiver of any such privilege or immunity. The inadvertent or mistaken
4 provision of any information or responsive documents subject to any such doctrine, privilege,
5 protection or immunity from production shall not constitute a general, inadvertent, implicit,
6 subject-matter, separate, independent or other waiver of such doctrine, privilege, protection or
7 immunity from production.

8 11. Irico objects to Plaintiff's Requests to the extent that they call for information or
9 documents that are not in the possession, custody, or control of Irico. Irico also objects to the
10 extent that any of Plaintiff's Requests seek information from non-parties or third parties,
11 including but not limited to any of Irico's subsidiary or affiliated companies.

12 12. Irico objects to Plaintiff's Requests to the extent that responding would require
13 Irico to violate the privacy and/or confidentiality of a third party or confidentiality agreement
14 with a third party.

15 13. Irico objects to Plaintiff's Requests to the extent that they seek information or
16 documents that are publicly available, already in Plaintiffs' possession, custody, or control, or
17 more readily available from other sources.

18 14. Irico objects to Plaintiff's Requests to the extent that they seek information or
19 documents concerning transactions outside the United States. Such Requests are unduly
20 burdensome and irrelevant because they do not relate to actions by Irico in or causing a direct
21 effect in the United States. Such Requests are also unduly burdensome and irrelevant to this
22 pending action as Plaintiffs' class definition is confined to "individuals and entities that indirectly
23 purchased Cathode Ray Tube Products . . . in the United States" (see Indirect Purchaser Plaintiffs'
24 Fourth Consolidated Amended Complaint).

25 15. Irico objects to Plaintiff's Requests to the extent that compliance would require
26 Irico to violate the laws, regulations, procedures, or orders of a judicial or regulatory body of
27 foreign jurisdictions.
28

1 16. Irico's responses, whether now or in the future, pursuant to Plaintiff's Requests
2 should not be construed as either (i) a waiver of any of Irico's general or specific objections or (ii)
3 an admission that such information or documents are either relevant or admissible as evidence.

4 17. Irico objects to Plaintiff's Requests to the extent that compliance would require
5 Irico to seek information or documents stored on backup or archived databases or other systems
6 that are not readily accessible or otherwise no longer active.

7 18. Irico objects to Plaintiff's Requests to the extent that they state and/or call for legal
8 conclusions.

9 19. Irico objects to the Requests to the extent that they contain express or implied
10 assumptions of fact or law with respect to the matters at issue in this case.

11 20. Irico objects to the Requests to the extent they seek documents that cannot be
12 removed or transmitted outside China without violating the laws and regulations of that country,
13 including but not limited to restrictions on the transmission of state secrets or trade secrets as
14 those terms are defined under Chinese law.

15 21. Irico objects that Plaintiff's Requests are irrelevant and premature because the
16 Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff.

17 22. Irico reserves the right to assert additional General and Specific Objections as
18 appropriate to supplement these Responses.

19 These General Objections apply to each Request as though restated in full in the responses
20 thereto. The failure to mention any of the foregoing General Objections in the specific responses
21 set forth below shall not be deemed as a waiver of such objections or limitations.

22 **GENERAL OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS**

23 1. Irico objects to the definition of "Communication" (Definition No. 6) on the
24 grounds that it is vague, ambiguous, and overly broad. Irico further objects to this definition to the
25 extent that it attempts to impose burdens on Irico beyond those imposed by the Federal Rules of
26 Civil Procedure.

27 2. Irico objects to the definition of "Document" (Definition No. 10) to the extent it
28 seeks to impose requirements that are beyond those imposed by the Federal Rules of Civil

1 Procedure, the Local Rules, or any other applicable laws.

2 3. Irico objects to the definition of “Employee” (Definition No. 11) on the grounds
3 that it calls for a legal conclusion and is otherwise vague, ambiguous, and overly broad. Irico
4 further objects to this definition to the extent that it attempts to impose burdens on Irico beyond
5 those imposed by the Federal Rules of Civil Procedure. Irico further objects to this definition to
6 the extent that it seeks information protected by the attorney client or other applicable privilege,
7 attorney work product doctrine, or otherwise seeks to violate rights of privacy under U.S. or
8 foreign law.

9 4. Irico objects to the definitions of “concerning,” “concerns,” “relate,” and
10 “relating” (Definitions No. 7 and 14) to the extent that such terms seek the discovery of
11 information or documents that are disproportionate to the needs of the case in determining
12 jurisdictional issues. Irico further objects to these terms to the extent that they seek to improperly
13 expand the scope of information or documents relevant to the issues set forth in Plaintiff’s
14 pleadings. Irico also objects to these definitions because responding to such vague, overly broad,
15 and ambiguous Requests would be unduly burdensome.

16 5. Irico objects to the definitions of “You” and “your” (Definition No. 1) to the extent
17 that Plaintiff defines those terms to include the Irico’s “present and former members, officer,
18 agents, employees, and all other persons acting or purporting to act on their behalf.” This
19 definition is legally incorrect, overbroad, unduly burdensome, vague, and ambiguous. Irico also
20 objects to the inclusion of “all present and former directors, officers, Employees, agents,
21 representatives or any Persons acting or purporting to act on behalf of” Irico within this definition
22 to the extent it purports to encompass information or documents that are protected by attorney-
23 client privilege, work product protection or any other applicable doctrine, privilege, protection or
24 immunity or otherwise calls for a legal conclusion.

25 6. Irico objects to the definitions of “CRT” and “CRT Products” (Definitions No. 8
26 and 9) on the grounds that they are vague, ambiguous and overly broad.

27 7. Irico objects to Instruction No. 1 as overly broad and unduly burdensome on the
28 grounds that it encompasses time periods outside of those relevant for resolving jurisdictional

1 issues.

2 8. Irico objects to each and every Instruction to the extent that it purports to impose
3 burdens or obligations broader than, inconsistent with, or not authorized under the Federal Rules
4 of Civil Procedure or other applicable rule or Order of this Court.

5 **SPECIFIC RESPONSES TO REQUESTS FOR PRODUCTION**

6 **REQUEST NO. 1**

7 All documents that the declarant considered, reviewed or relied upon as a factual basis for
8 the Declaration of Wenkai Zhang in Support of Irico's Motion to Set Aside Default dated
9 October 25, 2017 (Dkt. 5215-1) ("Zhang Declaration").

10 **RESPONSE TO REQUEST NO. 1**

11 Irico reasserts and incorporates each of the General Objections and Objections to the
12 Definitions and Instructions set forth above. Irico further objects that this request is irrelevant
13 and premature because the Court has not set a schedule for jurisdictional discovery or briefing
14 that applies to Plaintiff.

15 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
16 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

17 **REQUEST NO. 2**

18 All documents that you relied upon for the contention that you have a meritorious defense
19 of immunity under the Foreign Sovereign Immunity Act.

20 **RESPONSE TO REQUEST NO. 2**

21 Irico reasserts and incorporates each of the General Objections and Objections to the
22 Definitions and Instructions set forth above. Irico further objects that this request is irrelevant
23 and premature because the Court has not set a schedule for jurisdictional discovery or briefing
24 that applies to Plaintiff. Irico also objects that this request calls for information and documents
25 that are privileged under the attorney-client privilege and work product doctrine.

26 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
27 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

REQUEST NO. 3

All documents sufficient to show your corporate structure or organization throughout the Class Period, including, without limitations, departments, divisions, parents, subsidiaries, joint ventures, affiliates, or other sub-units that were engaged during the Class Period in the manufacture, marketing, sale or distribution of CRTs and/or CRT Products including, where applicable, the percentage of any stock or other interests directly owned by each such entity, as well as common management and/or boards of directors.

RESPONSE TO REQUEST NO. 3

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irico further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irico further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irico also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007. Irico also objects to this request on the grounds that identification of "all Documents" is overbroad, unduly burdensome, and disproportionate to the needs of the case. Irico also objects that this request seeks information that is publicly available.

Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

REQUEST NO. 4

As to each of your divisions, subdivisions, departments, units, subsidiaries, parents, affiliates and joint ventures during the Class Period, documents sufficient to identify each executive or employee with managerial authority who had responsibilities or duties with respect to each of the following:

- (a) the manufacturing or production of CRTs or CRT Products;

- (b) the marketing of CRTs or CRT Products;
- (c) the pricing of CRTs or CRT Products;
- (d) the sale or distribution of CRTs or CRT Products; and
- (e) maintaining any electronic database(s), including archives, of email or other electronic documents relating to CRTs or CRT Products.

RESPONSE TO REQUEST NO. 4

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irigo further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irigo further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irigo also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irigo also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irigo's status as of November 26, 2007. Irigo also objects that this request is vague and ambiguous in its use of the terms "managerial authority" and "responsibilities or duties."

Subject to and without waiving the objections stated above, Irigo refers Plaintiff to Irigo's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

REQUEST NO. 5

Documents sufficient to describe the circumstances surrounding the formation of Irigo Group and Irigo Display, including, without limitations, Articles of Association, corporate bylaws and regulations.

RESPONSE TO REQUEST NO. 5

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irigo further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irigo further objects that this request seeks information beyond the scope

1 of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's
 2 April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects that this request is
 3 overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving
 4 jurisdictional issues. Irico also objects to this request as overbroad as to the time period called
 5 for; the only relevant inquiry is Irico's status as of November 26, 2007. Irico also objects that this
 6 request seeks information that is publicly available.

7 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 8 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

9 **REQUEST NO. 6**

10 All documents relating to the rules and policies governing your corporate boards, board
 11 committees or management committees from your formation through December 13, 2007,
 12 including, without limitations, your corporate governance policy, policy on determining the
 13 board/committee structure and membership, and procedures and requirements for appointing and
 14 removing any board/committee members.

15 **RESPONSE TO REQUEST NO. 6**

16 Irico reasserts and incorporates each of the General Objections and Objections to the
 17 Definitions and Instructions set forth above. Irico further objects that this request is irrelevant
 18 and premature because the Court has not set a schedule for jurisdictional discovery or briefing
 19 that applies to Plaintiff. Irico further objects that this request seeks information beyond the scope
 20 of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's
 21 April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects that this request is
 22 overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving
 23 jurisdictional issues. Irico also objects to this request as overbroad as to the time period called
 24 for; the only relevant inquiry is Irico's status as of November 26, 2007.

25 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 26 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

27 **REQUEST NO. 7**

28 All documents relating to your employment policies from your formation through

December 13, 2007, including, if applicable, any government supervision of, and involvement in, your employment practices.

RESPONSE TO REQUEST NO. 7

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irigo further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irigo further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irigo also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irigo also objects to this request on the grounds that identification of "all Documents relating to" is overbroad, unduly burdensome, and disproportionate to the needs of the case. Irigo also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irigo's status as of November 26, 2007. Irigo also objects that this request is vague and ambiguous in its use of the term "employment policies."

Subject to and without waiving the objections stated above, Irigo refers Plaintiff to Irigo's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

REQUEST NO. 8

All documents including, without limitations, financial statements, reflecting any contributions of assets and liabilities you received from the PRC government from your formation through December 13, 2007.

RESPONSE TO REQUEST NO. 8

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irigo further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irigo further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irigo also objects that this request is

1 overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving
 2 jurisdictional issues. Irico also objects to this request on the grounds that identification of “all
 3 Documents” is overbroad, unduly burdensome, and disproportionate to the needs of the case.
 4 Irico also objects to this request as overbroad as to the time period called for; the only relevant
 5 inquiry is Irico’s status as of November 26, 2007.

6 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico’s
 7 responses to DPP’s jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

8 **REQUEST NO. 9**

9 All business plans, reports, budgets, forecasts, and sales or profit projections prepared by
 10 you from your formation through December 13, 2017 which were submitted to the PRC
 11 government for approval. Please include all documents relating to the business decisions or
 12 transactions referred to in paragraph 10 of the Zhang Declaration.

13 **RESPONSE TO REQUEST NO. 9**

14 Irico reasserts and incorporates each of the General Objections and Objections to the
 15 Definitions and Instructions set forth above. Irico further objects that this request is irrelevant
 16 and premature because the Court has not set a schedule for jurisdictional discovery or briefing
 17 that applies to Plaintiff. Irico further objects that this request seeks information beyond the scope
 18 of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court’s
 19 April 25, 2018 Order Denying Plaintiffs’ Motion to Compel. Irico also objects that this request is
 20 overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving
 21 jurisdictional issues. Irico also objects to this request on the grounds that identification of “all
 22 Documents” is overbroad, unduly burdensome, and disproportionate to the needs of the case.
 23 Irico also objects to this request as overbroad as to the time period called for; the only relevant
 24 inquiry is Irico’s status as of November 26, 2007.

25 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico’s
 26 responses to DPP’s jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

27 **REQUEST NO. 10**

28 All documents relating to contracts, offers or proposals for CRTs or CRT Product sales

1 during the Class Period.

2 **RESPONSE TO REQUEST NO. 10**

3 Irico reasserts and incorporates each of the General Objections and Objections to the
 4 Definitions and Instructions set forth above. Irico further objects that this request is irrelevant
 5 and premature because the Court has not set a schedule for jurisdictional discovery or briefing
 6 that applies to Plaintiff. Irico further objects that this request seeks information beyond the scope
 7 of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's
 8 April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects that this request is
 9 overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving
 10 jurisdictional issues. Irico also objects to this request on the grounds that identification of "all
 11 Documents relating to" is overbroad, unduly burdensome, and disproportionate to the needs of the
 12 case. Irico also objects to this request as overbroad as to the time period called for; the only
 13 relevant inquiry is Irico's status as of November 26, 2007.

14 **REQUEST NO. 11**

15 Documents sufficient to identify each of your sales of CRTs and/or CRT Products during
 16 the Class Period, as well as the following information for each CRT or CRT Product involved in
 17 each sale:

- 18 (a) customer names, customer billing addresses, and customer ship-to addresses;
- 19 (b) a description sufficient to identify the type of customer involved (e.g., OEM,
 20 ODM, AIB manufacturer, distributor or retailer).
- 21 (c) the sales terms;
- 22 (d) sales dates and shipment dates;
- 23 (e) product type, class, category, description, and respective use;
- 24 (f) sales volumes;
- 25 (g) unit price information, gross price, and actual net prices;
- 26 (h) discounts, credits, and rebates;
- 27 (i) shipping charges and terms;
- 28 (j) any other related charges; and

(k) amounts paid, dates paid, invoice numbers, and purchase order numbers. If such information is not kept, or has not been kept, in electronic form in the ordinary course of your business or are otherwise not available in electronic form, please produce such information in hard copy.

RESPONSE TO REQUEST NO. 11

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irco further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irco further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irco also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irco also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irco's status as of November 26, 2007.

Subject to and without waiving the objections stated above, Irco refers Plaintiff to Irco's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

REQUEST NO. 12

All documents showing the dollar volume or quantity of sales or shipments of CRTs or CRT Products (by type or category, if available) by you by month, quarter, calendar year or fiscal year during the Class Period.

RESPONSE TO REQUEST NO. 12

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irco further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irco further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irco also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving

jurisdictional issues. Irico also objects to this request on the grounds that identification of “all Documents” is overbroad, unduly burdensome, and disproportionate to the needs of the case. Irico also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irico’s status as of November 26, 2007.

Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico’s responses to DPP’s jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

REQUEST NO. 13

Documents sufficient to identify each of your facilities that produced CRTs or CRT Products during the Class Period, and for each such facility, all documents relating to:

- (a) capacity, rated capacity, production and capacity utilization during each year of the Class Period;
- (b) any proposed or actual change in the capacity to produce CRTs or CRT Products;
- (c) any reason for change in each facility’s actual production of CRTs or CRT Products;
- (d) the identity of all persons who had decision-making or supervisory responsibility regarding CRT or CRT Product production;
- (e) each type, class, category and respective use of CRTs or CRT Products produced and the amounts of each produced during each month of the Class Period;
- (f) any production shutdowns or slowdowns of CRT or CRT Product production and reasons for such shutdowns or slowdowns; and
- (g) any projected production forecasts.

RESPONSE TO REQUEST NO. 13

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irico further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irico further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court’s April 25, 2018 Order Denying Plaintiffs’ Motion to Compel. Irico also objects that this request is

1 overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving
 2 jurisdictional issues. Irico also objects to this request on the grounds that identification of “all
 3 documents relating to” is overbroad, unduly burdensome, and disproportionate to the needs of the
 4 case. Irico also objects to this request as overbroad as to the time period called for; the only
 5 relevant inquiry is Irico’s status as of November 26, 2007.

6 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico’s
 7 responses to DPP’s jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

8 **REQUEST NO. 14**

9 All documents relating to your percentage or share of industry production, capacity, sales
 10 or shipments of CRTs and/or CRT Products at any time during the Class Period.

11 **RESPONSE TO REQUEST NO. 14**

12 Irico reasserts and incorporates each of the General Objections and Objections to the
 13 Definitions and Instructions set forth above. Irico further objects that this request is irrelevant
 14 and premature because the Court has not set a schedule for jurisdictional discovery or briefing
 15 that applies to Plaintiff. Irico further objects that this request seeks information beyond the scope
 16 of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court’s
 17 April 25, 2018 Order Denying Plaintiffs’ Motion to Compel. Irico also objects that this request is
 18 overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving
 19 jurisdictional issues. Irico also objects to this request on the grounds that identification of “all
 20 documents relating to” is overbroad, unduly burdensome, and disproportionate to the needs of the
 21 case. Irico also objects to this request as overbroad as to the time period called for; the only
 22 relevant inquiry is Irico’s status as of November 26, 2007.

23 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico’s
 24 responses to DPP’s jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

25 **REQUEST NO. 15**

26 All documents relating to any meetings or communications between you and any parent,
 27 subsidiary, affiliated company, joint venture, or partner concerning the production, inventory
 28 levels, pricing, marketing, sale or distribution of CRTs or CRT Products during the Class Period.

RESPONSE TO REQUEST NO. 15

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irigo further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irigo further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irigo also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irigo also objects to this request on the grounds that identification of "all documents relating to" is overbroad, unduly burdensome, and disproportionate to the needs of the case. Irigo also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irigo's status as of November 26, 2007.

Subject to and without waiving the objections stated above, Irigo refers Plaintiff to Irigo's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

REQUEST NO. 16

All documents relating to any meetings or communications between you and any parent, subsidiary, affiliated company, joint venture, or partner concerning any sales or contemplated sales to the United States during the Class Period.

RESPONSE TO REQUEST NO. 16

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irigo further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irigo further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irigo also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irigo also objects to this request on the grounds that identification of "all documents relating to" is overbroad, unduly burdensome, and disproportionate to the needs of the

1 case. Irico also objects to this request as overbroad as to the time period called for; the only
 2 relevant inquiry is Irico's status as of November 26, 2007.

3 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 4 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

5 **REQUEST NO. 17**

6 All documents relating to any meetings or communications between you and any other
 7 manufacturer of CRTs or CRT Products concerning the production, inventory levels, pricing,
 8 marketing, sale or distribution of CRTs or CRT Products during the Class Period.

9 **RESPONSE TO REQUEST NO. 17**

10 Irico reasserts and incorporates each of the General Objections and Objections to the
 11 Definitions and Instructions set forth above. Irico further objects that this request is irrelevant
 12 and premature because the Court has not set a schedule for jurisdictional discovery or briefing
 13 that applies to Plaintiff. Irico further objects that this request seeks information beyond the scope
 14 of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's
 15 April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects that this request is
 16 overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving
 17 jurisdictional issues. Irico also objects to this request on the grounds that identification of "all
 18 documents relating to" is overbroad, unduly burdensome, and disproportionate to the needs of the
 19 case. Irico also objects to this request as overbroad as to the time period called for; the only
 20 relevant inquiry is Irico's status as of November 26, 2007.

21 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 22 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

23 **REQUEST NO. 18**

24 All documents relating to any meetings or communications between you and any other
 25 manufacturer of CRTs or CRT Products during which there was any discussion concerning any
 26 sales, contemplated sales, pricing, or shipments to customers in the United States during the Class
 27 Period.
 28

RESPONSE TO REQUEST NO. 18

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irigo further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irigo further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irigo also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irigo also objects to this request on the grounds that identification of "all documents relating to" is overbroad, unduly burdensome, and disproportionate to the needs of the case. Irigo also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irigo's status as of November 26, 2007.

Subject to and without waiving the objections stated above, Irigo refers Plaintiff to Irigo's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

REQUEST NO. 19

Documents sufficient to show the name and address of each industry or trade association (including committees and subcommittees) relating to CRTs or CRT Products of which you or any of your employees are or have been a member during the Class Period, as well as documents sufficient to show dates of membership and dates of participation in committees or subcommittees.

RESPONSE TO REQUEST NO. 19

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irigo further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irigo further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irigo also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving

jurisdictional issues. Irico also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

REQUEST NO. 20

All documents relating to meetings of each industry or trade association and each of its committees or subcommittees relating to CRTs or CRT Products, including all documents relating to any such meeting attended by you and any other CRT or CRT Product manufacturer and documents sufficient to identify individuals from your company who attended, the dates of attendance, and the subject matter discussed.

RESPONSE TO REQUEST NO. 20

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irico further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irico further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irico also objects to this request on the grounds that identification of "all documents relating to" is overbroad, unduly burdensome, and disproportionate to the needs of the case. Irico also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

REQUEST NO. 21

All studies, analyses, communications, presentations or other documents that you have submitted to or received from any industry or trade association concerning CRTs or CRT Products.

RESPONSE TO REQUEST NO. 21

Irigo reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irigo further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irigo further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irigo also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irigo also objects to this request on the grounds that identification of "all . . . documents" is overbroad, unduly burdensome, and disproportionate to the needs of the case. Irigo also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irigo's status as of November 26, 2007.

Subject to and without waiving the objections stated above, Irigo refers Plaintiff to Irigo's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

REQUEST NO. 22

Documents sufficient to describe your policies or practices with respect to the retention or destruction of documents during the period March 1, 1995 through the present, and, if such policy or practice has been different with respect to any category of documents or over different times, documents sufficient to identify each such category or time period and to describe your retention policy or practice with respect to each such category or time period.

RESPONSE TO REQUEST NO. 22

Irigo reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irigo further objects that this request is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irigo further objects that this request seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irigo also objects that this request is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving

jurisdictional issues. Irico also objects to this request as overbroad as to the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

Dated: May 25, 2018

BAKER BOTTS LLP

/s/ Stuart C. Plunkett

Stuart C. Plunkett

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Attorneys for Defendants

IRICO GROUP CORP. and

IRICO DISPLAY DEVICES CO., LTD.

CERTIFICATE OF SERVICE**In re: Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917**

I declare that I am employed in the County of San Francisco, California. I am over the age of eighteen years and not a party to the within case; my business address is: Baker Botts LLP, 101 California Street, Suite 3600, San Francisco, CA 94111.

On May 25, 2018, I served the following document(s) described as:

**IRICO DEFENDANTS' OBJECTIONS AND RESPONSES TO
INDIRECT PURCHASER PLAINTIFFS' FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS**

on the following interested parties in this action:

Guido Saveri (guido@saveri.com)
R. Alexander Saveri (rick@saveri.com)
Geoffrey C. Rushing (grushing@saveri.com)
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2280 Union Street
San Francisco, CA 94123

*Lead Counsel for the Direct Purchaser
Plaintiffs*

*Lead Counsel for the Indirect Purchaser
Plaintiffs*

☐ (BY OVERNIGHT DELIVERY) I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses listed above. I placed the envelope or package for collection and overnight delivery at an office or regularly utilized drop box of the overnight delivery carrier.

☐ (BY MAIL) by placing a true copy thereof in a sealed envelope with postage fully prepaid and addressed to the persons at the addresses as shown above. I am readily familiar with the business practice of Baker Botts LLP for collection and processing of correspondence for mailing with the United States Postal Service, and the correspondence would be deposited with United States Postal Service that same day in the ordinary course of business.

☒ (BY ELECTRONIC MAIL) I caused such documents to be sent to the persons at the email addressed listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 25, 2018, 2012 at San Francisco, California.

/s/ Stuart C. Plunkett

Stuart C. Plunkett

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10 *Attorneys for Defendants*
11 *IRICO GROUP CORP. and*
12 *IRICO DISPLAY DEVICES CO., LTD.*

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16
17 IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC
(N.D. Cal.)

MDL No. 1917

18
19 This Document Relates to:
20 ALL INDIRECT PURCHASER ACTIONS
21

**IRICO DEFENDANTS' OBJECTIONS
AND RESPONSES TO INDIRECT
PURCHASER PLAINTIFFS' FIRST
SET OF INTERROGATORIES**

22 PROPOUNDING PARTY: Indirect Purchaser Plaintiffs
23 RESPONDING PARTIES: Irico Group Corporation
24 Irico Display Devices Co., Ltd.
25 SET NUMBER: One
26
27
28

Pursuant to Federal Rules of Civil Procedure 26 and 33, Irico Group Corporation and Irico Display Devices Co, Ltd. (collectively, “Irico” or “Irico Defendants”) hereby respond to the Indirect Purchaser Plaintiffs’ (“Plaintiff”) First Set of Interrogatories (“Interrogatories”). Irico reserves the right to amend or supplement these Objections and Responses (the “Responses”) to the extent allowed by the Federal Rules of Civil Procedure and the Local Rules of Practice in Civil Proceedings before the United States District Court for the Northern District of California (“Local Rules”). Subject to and without waiving any of Irico’s General and Specific Objections as set forth below, Irico is willing to meet and confer with Plaintiff regarding such General and Specific Objections.

The following Responses are made only for purposes of this case. The Responses are subject to all objections as to relevance, materiality and admissibility, and to any and all objections on any ground that would require exclusion of any response if it were introduced in court. All evidentiary objections and grounds are expressly reserved.

These Responses are subject to the provisions of the Stipulated Protective Order that the Court issued on June 18, 2008 (“Protective Order”). Irico’s Responses are hereby designated “Confidential” in accordance with the provisions of the Protective Order.

GENERAL OBJECTIONS

Irico makes the following General Objections to Plaintiff’s Interrogatories:

1. Irico’s Responses are based upon information available to and located by Irico as of the date of service of these Responses. In responding to Plaintiff’s Interrogatories, Irico states that it has conducted, or will conduct, a diligent search, reasonable in scope, of those files and records in its possession, custody, or control believed to likely contain information responsive to Plaintiff’s Interrogatories.

2. No express, incidental, or implied admissions are intended by these Responses and should not be read or construed as such.

3. Irico does not intend, and its Responses should not be construed as, an agreement or acquiescence with any characterization of fact, assumption, or conclusion of law contained in or implied by the Interrogatories.

1 4. To the extent that Irico responds to Plaintiff's Interrogatories by stating that Irico
2 will produce or make available for examination responsive information or documents, Irico does
3 not represent that any such information or documents exist. Irico will make a good faith and
4 reasonable attempt to ascertain whether information responsive to Plaintiff's Interrogatories exists
5 and is properly producible, and will produce or make available for examination non-privileged
6 responsive materials to the extent any are located during the course of a reasonable search.

7 5. Irico objects to Plaintiff's Interrogatories to the extent that they are overly broad,
8 unduly burdensome, oppressive, and duplicative to the extent that they seek information or
9 documents that are already in the possession, custody, or control of Plaintiff.

10 6. Irico objects to Plaintiff's Interrogatories to the extent that they seek to impose
11 obligations on Irico beyond those of the Federal Rules of Civil Procedure, the Local Rules, or any
12 Order of this Court.

13 7. Irico objects to Plaintiff's Interrogatories to the extent they seek information that is
14 not relevant to jurisdictional issues or disproportionate to the needs of the case in resolving such
15 jurisdictional issues.

16 8. Irico objects to Plaintiff's Interrogatories to the extent that they are vague,
17 ambiguous, or susceptible to more than one interpretation. Irico shall attempt to construe such
18 vague or ambiguous Interrogatories so as to provide for the production of responsive information
19 that is proportionate to the needs of the case. If Plaintiff subsequently asserts an interpretation of
20 any Interrogatory that differs from Irico's understanding, Irico reserves the right to supplement or
21 amend its Responses.

22 9. Irico objects to Plaintiff's Interrogatories to the extent that they contain terms that
23 are insufficiently or imprecisely defined. Irico shall attempt to construe such vague or ambiguous
24 Interrogatories so as to provide for the production of responsive information that is proportionate
25 to the needs of the case.

26 10. Irico objects to Plaintiff's Interrogatories to the extent that they seek information
27 that is protected from disclosure by the attorney-client privilege, work product doctrine, joint
28 defense or common interest privilege, self-evaluative privilege, or any other applicable privilege

1 or immunity. Irico will provide only information that it believes to be non-privileged and
2 otherwise properly discoverable. None of Irico's responses is intended nor should be construed as
3 a waiver of any such privilege or immunity. The inadvertent or mistaken provision of any
4 information or responsive documents subject to any such doctrine, privilege, protection or
5 immunity from production shall not constitute a general, inadvertent, implicit, subject-matter,
6 separate, independent or other waiver of such doctrine, privilege, protection or immunity from
7 production.

8 11. Irico objects to Plaintiff's Interrogatories to the extent that they call for
9 information that is not in the possession, custody, or control of Irico. Irico also objects to the
10 extent that any of Plaintiff's Interrogatories seek information from non-parties or third parties,
11 including but not limited to any of Irico's subsidiary or affiliated companies.

12 12. Irico objects to Plaintiff's Interrogatories to the extent that responding would
13 require Irico to violate the privacy and/or confidentiality of a third party or confidentiality
14 agreement with a third party.

15 13. Irico objects to Plaintiff's Interrogatories to the extent that they seek information
16 that is publicly available, already in Plaintiffs' possession, custody, or control, or more readily
17 available from other sources.

18 14. Irico objects to Plaintiff's Interrogatories to the extent that they seek information
19 or documents concerning transactions outside the United States. Such Interrogatories are unduly
20 burdensome and irrelevant because they do not relate to actions by Irico in or causing a direct
21 effect in the United States. Such Interrogatories are also unduly burdensome and irrelevant to this
22 pending action as Plaintiffs' class definition is confined to "individuals and entities that indirectly
23 purchased Cathode Ray Tube Products . . . in the United States" (see Indirect Purchaser Plaintiffs'
24 Fourth Consolidated Amended Complaint).

25 15. Irico objects to Plaintiff's Interrogatories to the extent that compliance would
26 require Irico to violate the laws, regulations, procedures, or orders of a judicial or regulatory body
27 of foreign jurisdictions.
28

1 16. Irico's responses, whether now or in the future, pursuant to Plaintiff's
2 Interrogatories should not be construed as either (i) a waiver of any of Irico's general or specific
3 objections or (ii) an admission that such information or documents are either relevant or
4 admissible as evidence.

5 17. Irico objects to Plaintiff's Interrogatories to the extent that compliance would
6 require Irico to seek information stored on backup or archived databases or other systems that are
7 not readily accessible or otherwise no longer active.

8 18. Irico objects to Plaintiff's Interrogatories to the extent that they are compound
9 and/or contain discrete subparts in violation of Federal Rule of Civil Procedure 33(a)(1).

10 19. Irico objects to Plaintiff's Interrogatories to the extent that they state and/or call for
11 legal conclusions.

12 20. Irico objects to the Interrogatories to the extent that they contain express or
13 implied assumptions of fact or law with respect to the matters at issue in this case.

14 21. Irico objects that Plaintiff's Interrogatories are irrelevant and premature because
15 the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff.

16 22. Irico reserves the right to assert additional General and Specific Objections as
17 appropriate to supplement these Responses.

18 These General Objections apply to each Interrogatory as though restated in full in the
19 responses thereto. The failure to mention any of the foregoing General Objections in the specific
20 responses set forth below shall not be deemed as a waiver of such objections or limitations.

21 **GENERAL OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS**

22 1. Irico objects to the definitions of "You" and "Your" (Definition No. 1) to the
23 extent that Plaintiff defines those terms to include the Irico's "present and former members,
24 officer, agents, employees, and all other persons acting or purporting to act on their behalf." This
25 definition is legally incorrect, overbroad, unduly burdensome, vague, and ambiguous. Irico also
26 objects to the inclusion of "all present and former directors, officers, Employees, agents,
27 representatives or any Persons acting or purporting to act on behalf of" Irico within this definition
28 to the extent it purports to encompass information that is protected by attorney-client privilege,

1 work product protection or any other applicable doctrine, privilege, protection or immunity or
2 otherwise calls for a legal conclusion.

3 2. Irico objects to the definition of “Document” (Definition No. 8) to the extent it
4 seeks to impose requirements that are beyond those imposed by the Federal Rules of Civil
5 Procedure, the Local Rules, or any other applicable laws.

6 3. Irico objects to the definition of “Employee” (Definition No. 9) on the grounds
7 that it calls for a legal conclusion and is otherwise vague, ambiguous, and overly broad. Irico
8 further objects to this definition to the extent that it attempts to impose burdens on Irico beyond
9 those imposed by the Federal Rules of Civil Procedure. Irico further objects to this definition to
10 the extent that it seeks information protected by the attorney client or other applicable privilege,
11 attorney work product doctrine, or otherwise seeks to violate rights of privacy under U.S. or
12 foreign law.

13 4. Irico objects to the definitions of “CRT” and “CRT Products” (Definitions No. 6
14 and 7) on the grounds that they are vague, ambiguous and overly broad. Irico further objects to
15 the use of the term “CRT Products” to the extent that it is inconsistent with the definition of
16 “CRT Products” as set forth in Plaintiff’s pleadings.

17 5. Irico objects to Instruction No. 1 (related to identification of persons) to the extent
18 that it purports to impose burdens or obligations broader than, inconsistent with, or not authorized
19 under the Federal Rules of Civil Procedure, including, without limiting the generality of the
20 foregoing, Rule 26(b)(5)(A) and Rule 26(e)(1). Irico further objects to this Instruction to the
21 extent that it purports to impose burdens or obligations broader than, inconsistent with, or not
22 authorized under, the Local Rules and any orders of the Court, and on the grounds that it is vague,
23 ambiguous, and inconsistent with common usage. Irico further objects to this Instruction to the
24 extent it seeks information that would disclose personal confidential information and/or violate
25 any and all rights of privacy under the United States Constitution or Article I of the Constitution
26 of the State of California, or any other applicable law or state constitution, or that is otherwise
27 prohibited from disclosure because to do so would cause Irico to violate legal and/or contractual
28 obligations to any other persons or entities.

6. Irico objects to Instruction No. 2 (related to identification of an entity other than a natural person) to the extent that it purports to impose burdens or obligations broader than, inconsistent with, or not authorized under the Federal Rules of Civil Procedure or other applicable rule or Order of this Court.

7. Irico objects to Instruction No. 3 (related to the production of business records in response to an interrogatory pursuant to Federal Rule of Civil Procedure 33(d)) on the grounds that it is unduly burdensome and purports to impose burdens and obligations upon Irico beyond those required by the Federal Rules of Civil Procedure or other applicable rule or Order of this Court.

SPECIFIC RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1

State the name, address, telephone number, and relationship to you of each person who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

RESPONSE TO INTERROGATORY NO. 1

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irico further objects that this interrogatory is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff.

Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

INTERROGATORY NO. 2

Describe the circumstances surrounding the formation of Irico Group and Irico Display including, without limitations, (i) the year in which the entity was formed; (ii) the purpose(s) and scope of business; (iii) the organizational and ownership structure of the entity; (iv) the source and amount of initial capital contributions; (v) the geographic location in which the entity was incorporated or registered; (vi) the laws, regulations or decrees under which the entity was incorporated; and (vii) any state-owned assets supervision and administration authority that

1 approved the entity's establishment.

2 **RESPONSE TO INTERROGATORY NO. 2**

3 Irico reasserts and incorporates each of the General Objections and Objections to the
4 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
5 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
6 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
7 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
8 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
9 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
10 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
11 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

12 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
13 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

14 **INTERROGATORY NO. 3**

15 For the period from formation through December 13, 2007, describe any changes in the
16 ownership interest held in Irico Group and Irico Display, including any changes in the percentage
17 of any stock, equity or other interests directly owned by the PRC government or by any other
18 entities.

19 **RESPONSE TO INTERROGATORY NO. 3**

20 Irico reasserts and incorporates each of the General Objections and Objections to the
21 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
22 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
23 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
24 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
25 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
26 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
27 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
28 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

1 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
2 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

3 **INTERROGATORY NO. 4**

4 For the period from formation through December 13, 2007, describe the corporate
5 relationship between Irico Group and Irico Display in terms of corporate governance, including
6 the role of Irico Group in Irico Display's financial transactions, business activities, daily
7 operations, and legal affairs.

8 **RESPONSE TO INTERROGATORY NO. 4**

9 Irico reasserts and incorporates each of the General Objections and Objections to the
10 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
11 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
12 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
13 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
14 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
15 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
16 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
17 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

18 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
19 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

20 **INTERROGATORY NO. 5**

21 Identify, separately for each year from formation through December 13, 2007, each of
22 your corporate board, board committee or management committee, including (i) its full name;
23 (ii) a brief description of its function; and (iii) the procedures and requirements for appointing and
24 removing any board/committee members.

25 **RESPONSE TO INTERROGATORY NO. 5**

26 Irico reasserts and incorporates each of the General Objections and Objections to the
27 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
28 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or

1 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
 2 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
 3 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
 4 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
 5 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
 6 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

7 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 8 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

9 **INTERROGATORY NO. 6**

10 For each board, board committee or management committee identified in Interrogatory
 11 No. 5, identify each person who served as a member of the corporate board, board committee or
 12 management committee. For each person identified, include the person's name, his/her corporate
 13 position(s), job duties, dates of employment/tenure, the entity which designated the person to the
 14 board or committee, whether the person concurrently held a position as public official and if so,
 15 the person's government title, duties, dates and term of office.

16 **RESPONSE TO INTERROGATORY NO. 6**

17 Irico reasserts and incorporates each of the General Objections and Objections to the
 18 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
 19 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
 20 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
 21 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
 22 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
 23 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
 24 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
 25 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

26 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 27 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

28 **INTERROGATORY NO. 7**

Describe, separately for each year from formation through December 13, 2007, your employment policies, including (i) whether the PRC government supervised your employment practices; (ii) whether the PRC government required the hiring of public officials; and (iii) whether the PRC government paid salaries of any public officials for serving in their corporate capacities.

RESPONSE TO INTERROGATORY NO. 7

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irco further objects that this interrogatory is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irco further objects that this interrogatory seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irco also objects that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irco also objects to this interrogatory as overbroad as to the time period called for; the only relevant inquiry is Irco's status as of November 26, 2007. Irco also objects that this interrogatory is vague and ambiguous in its use of the term "employment policies."

Subject to and without waiving the objections stated above, Irco refers Plaintiff to Irco's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

INTERROGATORY NO. 8

State, separately for each year from formation through December 13, 2007, the identity and positions of each person who approved or authorized your corporate operating budget, including, without limitations, the estimates of revenues, the estimates of operating and capital expenditures, and the estimates of borrowings.

RESPONSE TO INTERROGATORY NO. 8

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irco further objects that this interrogatory is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or

1 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
 2 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
 3 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
 4 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
 5 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
 6 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

7 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 8 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

9 **INTERROGATORY NO. 9**

10 For the period from formation through December 13, 2007, state the date, amount and
 11 interest rate (if applicable) of each capital or equity injection, loan, grant, financial contribution,
 12 or any other financial support provided by the PRC government to you.

13 **RESPONSE TO INTERROGATORY NO. 9**

14 Irico reasserts and incorporates each of the General Objections and Objections to the
 15 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
 16 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
 17 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
 18 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
 19 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
 20 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
 21 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
 22 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

23 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 24 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

25 **INTERROGATORY NO. 10**

26 For each year from formation through December 13, 2007, state whether you were
 27 permitted by law to obtain government guarantees on commercial debts; if yes, identify any
 28 legally binding contractual engagement between the PRC government and any commercial lender

1 through which the government guarantee(s) on commercial debts were made on your behalf,
 2 including the date and amount of the guarantee(s), and the identity of the third-party lender.

3 **RESPONSE TO INTERROGATORY NO. 10**

4 Irico reasserts and incorporates each of the General Objections and Objections to the
 5 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
 6 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
 7 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
 8 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
 9 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
 10 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
 11 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
 12 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

13 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 14 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

15 **INTERROGATORY NO. 11**

16 For each year from formation through December 13, 2007, identify any special privileges
 17 or obligations that you contend you enjoyed under PRC laws as a state-owned entity.

18 **RESPONSE TO INTERROGATORY NO. 11**

19 Irico reasserts and incorporates each of the General Objections and Objections to the
 20 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
 21 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
 22 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
 23 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
 24 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
 25 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
 26 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
 27 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

28 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's

1 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

2 **INTERROGATORY NO. 12**

3 For each year from formation through December 13, 2007, state the basis for any
4 contention that you engaged in public activity on behalf of the PRC government.

5 **RESPONSE TO INTERROGATORY NO. 12**

6 Irico reasserts and incorporates each of the General Objections and Objections to the
7 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
8 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
9 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
10 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
11 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
12 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
13 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
14 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

15 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
16 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

17 **INTERROGATORY NO. 13**

18 Identify each and actual proposed agreements between you and any producer of CRTs
19 and/or CRT Products, including the named defendants in this coordinated proceeding, relating to
20 prices, pricing, production or inventory levels of CRTs and/or CRT Products during the Class
21 Period. For every such actual or proposed agreement, state:

- 22 (a) the identity of the participants and all persons with knowledge thereof;
- 23 (b) when such agreement was entered into;
- 24 (c) where such agreement was entered into;
- 25 (d) the terms of such agreement; and
- 26 (e) when, how and which of your officers, directors or employees discovered the
27 existence of such agreement.

28 **RESPONSE TO INTERROGATORY NO. 13**

1 Irico reasserts and incorporates each of the General Objections and Objections to the
 2 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
 3 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
 4 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
 5 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
 6 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
 7 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
 8 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
 9 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.
 10 Irico also objects that this interrogatory is vague and ambiguous in its use of the term "each and
 11 actual proposed agreements."

12 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 13 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

14 **INTERROGATORY NO. 14**

15 Identify any meeting or communication between you and other producers of CRTs and/or
 16 CRT Products during the Class Period, including the named Defendants in this coordinated
 17 proceeding, regarding CRT and/or CRT Product pricing, price increase announcements, terms or
 18 conditions of sales, profit margins or market share, production levels, inventory status, customers,
 19 sales & profit, or import & export, and for each such meeting or communication:

- 20 (a) provide the date and location of the meeting or communication;
- 21 (b) identify the person(s) who initiated, called, organized, attended or participated in
 22 the meeting or communication;
- 23 (c) describe the subject matter discussed and any information you provided or
 24 received;
- 25 (d) describe every action taken by you as a result of the meeting or communication;
 26 and
- 27 (e) identify all persons with knowledge relating to the meeting or communication.

28 **RESPONSE TO INTERROGATORY NO. 14**

1 Irico reasserts and incorporates each of the General Objections and Objections to the
 2 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
 3 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
 4 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
 5 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
 6 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
 7 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
 8 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
 9 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

10 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 11 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

12 **INTERROGATORY NO. 15**

13 Identify each instance during the Class Period in which you instituted a price increase or
 14 decrease for CRTs and/or CRT Products, and for each such instance:

- 15 (a) when such price increase or decrease was announced publicly;
- 16 (b) when such price increase or decrease was implemented;
- 17 (c) the amount of the price increase or decrease;
- 18 (d) whether such price increase or decrease was withdrawn;
- 19 (e) each person with responsibility for implementing such price increase or decrease
 20 or its withdrawal; and
- 21 (f) any explanation given for such price increase or decrease or withdrawal.

22 **RESPONSE TO INTERROGATORY NO. 15**

23 Irico reasserts and incorporates each of the General Objections and Objections to the
 24 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
 25 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
 26 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
 27 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
 28 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects

1 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
 2 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
 3 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

4 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 5 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

6 **INTERROGATORY NO. 16**

7 Identify the CRTs and/or CRT Products that you manufactured or produced for each
 8 month during the Class Period, including the brand name, product number, and intended use.

9 **RESPONSE TO INTERROGATORY NO. 16**

10 Irico reasserts and incorporates each of the General Objections and Objections to the
 11 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
 12 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
 13 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
 14 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
 15 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
 16 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
 17 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
 18 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

19 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 20 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

21 **INTERROGATORY NO. 17**

22 Identify the CRTs and/or CRT Products that you sold, marketed, or distributed for each
 23 month during the Class Period, including the brand name, product number, and intended use.

24 **RESPONSE TO INTERROGATORY NO. 17**

25 Irico reasserts and incorporates each of the General Objections and Objections to the
 26 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
 27 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
 28 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information

beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

INTERROGATORY NO. 18

Identify every channel used by you to sell, market, or distribute CRTs and/or CRT Products during the Class Period, including:

- (a) the identity of the entity or division that issued the invoice for the CRT and/or CRT Product sale;
- (b) the identity of the entity to which you invoiced the CRT and/or CRT Product sale;
- (c) the destined country or region of CRTs and/or CRT Products;
- (d) the type of CRT and/or CRT Product sold or distributed through each channel;

If You used different channels at different points within the Class Period, identify when you used each channel to sell, market, or distribute CRTs and/or CRT Products.

RESPONSE TO INTERROGATORY NO. 18

Irico reasserts and incorporates each of the General Objections and Objections to the Definitions and Instructions set forth above. Irico further objects that this interrogatory is irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's

1 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

2 **INTERROGATORY NO. 19**

3 Provide your sales of CRTs and/or CRT Products to the United States and globally for
4 each month, quarter, calendar year or fiscal year during the Class Period. Please state the volume
5 of sales, the U.S. dollar value of sales, the unit sale price, the per unit cost to produce CRT and/or
6 tariff, customs, duties, inland freight, storage, insurance, dealer commissions, and the per unit
7 profit earned.

8 **RESPONSE TO INTERROGATORY NO. 19**

9 Irico reasserts and incorporates each of the General Objections and Objections to the
10 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
11 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
12 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
13 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
14 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
15 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
16 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
17 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

18 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
19 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

20 **INTERROGATORY NO. 20**

21 Describe any steps you have taken since December 13, 2007 to preserve evidence,
22 including all relevant documents and information relating to: (i) Plaintiffs' claims and allegations
23 in their complaints; (ii) your affirmative defenses, including any defense under the Foreign
24 Sovereign Immunity Act; (iii) your purchases and/or sales of CRTs and/or CRT Products,
25 including related transactional data; and (iv) your communications, including any contracts or
26 agreements with other sellers and/or manufacturers of CRTs and/or CRT Products.

27 **RESPONSE TO INTERROGATORY NO. 20**

28 Irico reasserts and incorporates each of the General Objections and Objections to the

1 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
 2 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
 3 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
 4 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
 5 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
 6 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
 7 case in resolving jurisdictional issues. Irico also objects to this interrogatory as overbroad as to
 8 the time period called for; the only relevant inquiry is Irico's status as of November 26, 2007.

9 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
 10 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

11 **INTERROGATORY NO. 21**

12 State whether any documents or information responsive to this set of interrogatories were
 13 destroyed, discarded, erased, deleted, purged, or otherwise lost. If your answer is in any way in
 14 the affirmative:

- 15 (a) describe in detail the contents of each such document or information and the date it
 16 was destroyed, discarded, erased, deleted, purged, or lost;
- 17 (b) identify each person who had any role or responsibility in destroying;
- 18 (c) describe in detail the circumstances under which each such document or
 19 information was destroyed, discarded, erased, deleted, purged, or lost.

20 **RESPONSE TO INTERROGATORY NO. 21**

21 Irico reasserts and incorporates each of the General Objections and Objections to the
 22 Definitions and Instructions set forth above. Irico further objects that this interrogatory is
 23 irrelevant and premature because the Court has not set a schedule for jurisdictional discovery or
 24 briefing that applies to Plaintiff. Irico further objects that this interrogatory seeks information
 25 beyond the scope of what is relevant to resolving jurisdictional issues and beyond that authorized
 26 under the Court's April 25, 2018 Order Denying Plaintiffs' Motion to Compel. Irico also objects
 27 that this interrogatory is overbroad, unduly burdensome, and disproportionate to the needs of the
 28 case in resolving jurisdictional issues.

1 Subject to and without waiving the objections stated above, Irico refers Plaintiff to Irico's
2 responses to DPP's jurisdictional discovery, which were served on Plaintiff on May 4, 2018.

3 Dated: May 25, 2018

BAKER BOTTS LLP

4
5 /s/ Stuart C. Plunkett

Stuart C. Plunkett

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14 *Attorneys for Defendants*

15 *IRICO GROUP CORP. and*

16 *IRICO DISPLAY DEVICES CO., LTD.*

CERTIFICATE OF SERVICE**In re: Cathode Ray Tube (CRT) Antitrust Litigation - MDL No. 1917**

I declare that I am employed in the County of San Francisco, California. I am over the age of eighteen years and not a party to the within case; my business address is: Baker Botts LLP, 101 California Street, Suite 3600, San Francisco, CA 94111.

On May 25, 2018, I served the following document(s) described as:

**IRICO DEFENDANTS' OBJECTIONS AND RESPONSES TO
INDIRECT PURCHASER PLAINTIFFS' FIRST SET OF INTERROGATORIES**

on the following interested parties in this action:

Guido Saveri (guido@saveri.com)
R. Alexander Saveri (rick@saveri.com)
Geoffrey C. Rushing (grushing@saveri.com)
Cadio Zirpoli (cadio@saveri.com)
Matthew D. Heaphy (mheaphy@saveri.com)
SAVERI & SAVERI, INC.
706 Sansome St # 200,
San Francisco, CA 94111

Mario N. Alioto (malieto@tatp.com)
Lauren C. Capurro (lauren russell@tatp.com)
Joseph M. Patane (jpatane@tatp.com)
TRUMP, ALIOTO, TRUMP & PRESCOTT,
LLP
2280 Union Street
San Francisco, CA 94123

*Lead Counsel for the Direct Purchaser
Plaintiffs*

*Lead Counsel for the Indirect Purchaser
Plaintiffs*

☐ (BY OVERNIGHT DELIVERY) I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses listed above. I placed the envelope or package for collection and overnight delivery at an office or regularly utilized drop box of the overnight delivery carrier.

☐ (BY MAIL) by placing a true copy thereof in a sealed envelope with postage fully prepaid and addressed to the persons at the addresses as shown above. I am readily familiar with the business practice of Baker Botts LLP for collection and processing of correspondence for mailing with the United States Postal Service, and the correspondence would be deposited with United States Postal Service that same day in the ordinary course of business.

☒ (BY ELECTRONIC MAIL) I caused such documents to be sent to the persons at the email addressed listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 25, 2018, 2012 at San Francisco, California.

/s/ Stuart C. Plunkett

Stuart C. Plunkett